

HIGHLY SENSITIVE DOCUMENT

HSD

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America v. )

Vladislav Dmitriyevich Klyushin, a/k/a Vladislav Kliushin,  
 Ivan Sergeyevich Ermakov, a/k/a Ivan Yermakov,  
 Igor Sergeevich Sladkov,  
 Mikail Vladimirovich Irzak, a/k/a Mikka Irzak, and  
 Nikolai Mikhaylovich Rumiantcev, a/k/a Nikolay Rummyantsev

Case No.

21-MJ-2090 (MBB) (under seal)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2018 to 2020 in the county of Suffolk in the  
       District of Massachusetts, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 371

Conspiracy to commit computer intrusion, wire fraud, and securities fraud,  
 contrary to 18 U.S.C. §§ 1030(a)(4) & 1343 and 15 U.S.C. §§ 78j(b) and  
 78ff(a).

DOCKETED

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT BJ KANG

☒ Continued on the attached sheet.

Sworn to me telephonically.

Date:

~~03/24/2021~~

March 20, 2021  
 @ 5:01 PM

City and state:

BROOKLINE, MASSACHUSETTS

B.J. Kang by MBB  
 Complainant's signature

FBI SPECIAL AGENT BJ KANG

Printed name and title

Marianne B. Bowler  
 Judge's signature

HONORABLE MARIANNE B. BOWLER, U.S.M.J.

Printed name and title